

Exhibit F



Chris Fladgate <cf@gs2law.com>

RE: Feingold v. RageOn - Notice of Deposition

Betty Tufariello <PBTufariello@intellectulaw.com>

Wed, Jun 12, 2019 at 10:56 AM

To: Chris Fladgate <cf@gs2law.com>

Cc: Betty Tufariello <intellectulaw@gmail.com>, Alina Orban <AOrban@intellectulaw.com>, Andrea Timpone <at@gs2law.com>

Chris:

I am writing to let you know that after long and careful consideration RageOn has decided that it will not be attending its deposition tomorrow. The reasons for RageOn's unwillingness and decision not to attend its deposition is twofold:

- a) Ms. Feingold has failed to meet her burden of proving by a preponderance of the evidence that they are the owner of a valid copyright despite our *May 17, 2019 Letter to J. Gorenstein (E.C.F. No. 55)* – at least sufficient to warrant the parties' expense on both sides for a deposition recorded by both stenographic and video means. And
- b) The *de minimis* sales of any of the allegedly infringing works also do not merit the incurrence of any further costs in this case, by either party.

RageOn has asked us to share with you the following thoughts, and it respectfully requests that you share these thoughts with your client. We sincerely hope that you do.

Mike Krilivsky built www.RageOn.com to empower people to create, design and sell their own designs on merchandise like T-Shirts, sweatshirts, leggings, yoga mats, etc. RageOn empowers people to build brands, to be entrepreneurs, and to make a living and create their own freedom with RageOn's platform.

www.RageOn.com is a User Generated Content (UGC) marketplace similar to Amazon, Shopify, Redbubble, etc. People have the freedom to upload designs/products and make them "live" immediately. RageOn has systems in place that scan every upload of obvious infringements and then even manual review. But it's impossible for RageOn, or a computer to have knowledge of all registered copyrights or trademarks, and then determine if an image is infringing or not, or if the user has a license with the brand in place and so on. Most of the time, RageOn's platform is being used as intended. Sometimes, though, they do get "bad actors" that take advantage and do things that they shouldn't do, as for example use likenesses or IP that isn't theirs. RageOn has worked EXTREMELY hard to prevent and to mitigate the actions of bad actors, while still preserving the freedom of usage and creation.

RageOn sales of products with Ms. Feingold's allegedly copyrighted images are *de minimis*. There are no damages, there is no willful infringement. Prolonging this case further and expecting to take RageOn's deposition does not serve anyone, let alone the parties who will have to incur costs on both sides. Although RageOn has raised money in the past through investors, because they believe that RageOn is creating something unique, powerful and helping change the world to be a better place, RageOn is still a small StartUp with a "net cash burn". It is still in the stage that it spends more money than it makes each month, because it is still trying to grow the technology and make the technology super valuable to the world-enabling creators and sellers to sell more styles of products, higher quality, at lower prices with faster shipping times.

RageOn is prepared to repeat all of the above in a sworn affidavit. RageOn is not in any financial position to continue to defend a lawsuit that just makes no sense under the circumstances set forth above. Nor will Ms. Feingold's ROI increase by insisting on litigating the matter. The better path to take is the path to settlement. To this end and in view of all of the foregoing, RageOn is willing to enter into settlement for an amount that is reasonable, i.e., \$5,000, and non-payment terms that will help shore up Ms. Feingold's rights to her images.

Regards,

P. Betty Tufariello, Esq.

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From: Chris Fladgate [mailto:cf@gs2law.com]

Sent: Tuesday, June 11, 2019, 10:06 AM

To: Betty Tufariello <PBtufariello@intellectulaw.com>

Cc: Betty Tufariello <intellectulaw@gmail.com>; Alina Orban <AOrban@intellectulaw.com>; Andrea Timpone <at@gs2law.com>

Subject: Re: Feingold v. RageOn - Notice of Deposition

Hi Betty,

As the deposition is now 48 hours away, please advise who, from RageOn, will be attending the deposition this Thursday.

Regards,

Chris

Chris Fladgate

Partner

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On Jun 10, 2019, at 12:19 PM, Chris Fladgate <cf@gs2law.com> wrote:

Hi Betty,

I did not hear from you on Friday, as you promised.

Please advise who, from RageOn, will be attending the deposition on June 13.

Regards,

Chris

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On Jun 7, 2019, at 10:49 AM, Betty Tufariello <BTufariello@intellectulaw.com> wrote:

Good Morning Chris.

I acknowledge receipt of your emails. I will be getting back to you by the end of the day.

Here for you- Betty.

Your Brand Professional- Your better business partner.

P. Betty Tufariello, Esq.

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From: Chris Fladgate [<mailto:cf@gs2law.com>]

Sent: Friday, June 07, 2019 10:48 AM

To: Betty Tufariello <PBtufariello@intellectulaw.com>

Cc: Betty Tufariello <intellectulaw@gmail.com>; Alina Orban <AOrban@intellectulaw.com>; Andrea Timpone <at@gs2law.com>

Subject: Re: Feingold v. RageOn - Notice of Deposition

Hi Betty,

Following up from my earlier email and the Notice of Deposition, please advise who, from RageOn, will be attending the deposition on June 13.

Regards,

Chris

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On Jun 5, 2019, at 6:20 PM, Chris Fladgate <cf@gs2law.com> wrote:

Hi Betty,

Please advise who, from RageOn, will be attending the deposition on June 13.

Regards,

Chris

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On May 28, 2019, at 1:03 PM, Betty Tufariello <PBTufariello@intellectulaw.com> wrote:

Chris:

Good afternoon.

Indeed, RageOn will be attending its 30(b)(6) deposition, as previously ordered by the Court and as we agreed. Please provide me with an amended 30(b)(6) Notice of Deposition together with the topics on which RAGEON will be expected to testify on.

RageOn reserves the right to designate the witnesses that will be prepared and/or most knowledgeable to testify in connection with the topics identified in your Notice.

Here for you- Betty.

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P. Betty Tufariello, Esq.

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From: Chris Fladgate [<mailto:cf@gs2law.com>]
Sent: Tuesday, May 28, 2019 12:36 PM
To: Betty Tufariello <PBtufariello@intellectulaw.com>
Cc: Betty Tufariello <intellectulaw@gmail.com>; Alina Orban <AOrban@intellectulaw.com>; Andrea Timpone <at@gs2law.com>
Subject: Re: Feingold v. RageOn - Notice of Deposition

Hi Betty,

Please confirm that you and your client will attend the deposition on June 13.

Regards,

Chris

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On May 23, 2019, at 11:39 AM, Chris Fladgate <cf@gs2law.com> wrote:

Hi Betty,

Let's do the deposition on June 13, commencing at 10am at our offices.

Regards,

Chris

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On May 21, 2019, at 8:22 PM, Chris Fladgate
<cf@gs2law.com> wrote:

Thanks Betty,

Please answer my two questions:

1. When did you inform me, on multiple occasions no less, that your client resides in San Francisco?

2. Why can't your client appear on May 29? If inconvenience is such a trivial thing to show (as you assert), I don't understand why you are withholding this information.

I also notice that you provided a date that is a Saturday (June 22). Do you consider a deposition on a Saturday to be not burdensome?

Please answer my three questions.

Regards,

Chris

Chris Fladgate

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On May 21, 2019, at 6:16 PM, Betty Tufariello
<BTufariello@intellectulaw.com> wrote:

Chris:

Please note that my client will not be appearing on May 29, 2019.

As I stated, my client is unavailable. My statement regarding my client's unavailability considering that he lives in San Francisco and is the CEO of a company is sufficient to explain why my client cannot appear for a deposition on the 29th of May. I am not required to provide you any additional information since the Judge specifically said that "if Defendant wishes to change that date because it is **inconvenient**, it may seek Plaintiff's consent in writing – or if necessary make an application that complies with Paragraph 2.A of the Court's Individual Practices."

Inconvenience is an extremely low threshold even lower than the fact that my client is unavailable.

I too will be out this week. I am traveling to Albuquerque, New Mexico Thursday morning. But I will be back in the office on Tuesday, May 28, 2019. However, I can be available for a phone conference if you would like, late on Thursday afternoon, as

I believe New Mexico is a couple of hours behind. A telephone conference is required under Paragraph 2.A of the Court's individual practices if I am to petition the Court's intervention on this matter.

We have provided you with, not one, not two, but 6 alternate dates that are neither burdensome nor prejudicial to either party. At least one date should work for you and your client. Of course, your client may decide to reject all 6 dates. If that will be the case, then all I ask is that you extend me the courtesy of letting me know sooner rather than later and preferably no later than the end of Thursday, during our telephone conference, so that I can make arrangements to bring the matter to Judge Gorenstein.

Have a good night and safe travels.

Here for you- Betty.

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P. Betty Tufariello, Esq.

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From: Chris Fladgate
[mailto:cf@gs2law.com]
Sent: Tuesday, May 21, 2019 5:51 PM
To: Betty Tufariello
<PBTufariello@intellectulaw.com>
Cc: Betty Tufariello
<intellectulaw@gmail.com>; Alina Orban
<AOrban@intellectulaw.com>; Andrea
Timpone <at@gs2law.com>
Subject: Re: Feingold v. RageOn - Notice of Deposition

Hi Betty,

I am out of the office until Thursday and will consult my calendar and respond in due course. As of now, the deposition remains scheduled for May 29. Please inform your client.

In the meantime, when have you represented on multiple times that he resides in San Francisco? I don't believe you have represented it once.

Finally, what are your client's previously made plans?

Regards,

Chris

Chris Fladgate

Partner

Garson, Ségal, Steinmetz, Fladgate LLP

164 West 25th Street, Suite 11R

US2law.com Mr. Krilivsky v. Rago On = Notice of Deposition
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On May 21, 2019, at 5:43 PM, Betty Tufariello
<PBTufariello@intellectulaw.com> wrote:

Chris:

Good afternoon. I hope all is well.

I am writing to you pursuant to Mag. J. Gorenstein's Order of May 17, 2019 (E.C.F. NO. 56, a copy of which I am forwarding to you, with this email, for your convenience), to request that we change the date for Mr. Krilivsky's deposition from May 29, 2019, to any one of these dates: 06/12, 06/13; or 06/18, 06/19; or 06/21, 06/22. As I have represented to you numerous times, he resides in San Francisco and does a lot of traveling. He is unavailable on May 29 due to previously made plans.

Please let me know what days work for you.

Here for you- Betty.

Your Brand Professional- Your better business partner.

P. Betty Tufariello, Esq.

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From: Chris Fladgate
[mailto:cf@gs2law.com]
Sent: Thursday, May 09, 2019
1:23 PM
To: Betty Tufariello
<PBtufariello@intellectulaw.com>; Betty Tufariello
<intellectulaw@gmail.com>
Cc: Alina Orban
<AOrban@intellectulaw.com>;
Andrea Timpone
<at@gs2law.com>
Subject: Feingold v. RageOn
- Notice of Deposition

Hi Betty,

Pursuant to the Court's order of earlier today, I attach, by way of service, a Second Notice of Deposition for RageOn. The deposition is set for Wednesday, May 29, 2019 at 10:00am at our offices.

Regards,

Chris

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<DOC 56 ORDER RageOn Inc.
must appear on May 29, 2019, for
its deposition in accordance with
this Order.pdf>